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18 Attorneys for Plaintiff

19 SEANDEE GAYDEN

20 *[Additional counsel on following page]*

21 UNITED STATES DISTRICT COURT
22 CENTRAL DISTRICT OF CALIFORNIA

23 SEANDEE GAYDEN, an individual, on
24 behalf of herself and on behalf of all
25 persons similarly situated,

26 Plaintiff,

27 v.

28 FEDEX FREIGHT, INC., a Corporation,
and DOES 1 through 50, inclusive,

Defendants.

Case No. 2:23-cv-06560-MCS-AS

**JOINT STIPULATION FOR
DISMISSAL WITH PREJUDICE**

Complaint Filed: May 23, 2023
Removal Filed: August 11, 2023

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11 FEDEX FREIGHT, INC.
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1 Plaintiff Seandee Gayden (“Plaintiff”) and Defendant FedEx Freight, Inc.
2 (“Defendant”) (collectively, “Parties”), through their counsel of record, hereby stipulate,
3 pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), in consideration of a negotiated
4 settlement executed by them, to the Dismissal With Prejudice of this action, including all
5 claims and counterclaims stated herein against all parties, with the exception of Plaintiff’s
6 representative PAGA claim, for which the Parties seek Dismissal Without Prejudice, with
7 each party to bear its own attorneys' fees and costs.

8 **SO STIPULATED.**

9
10 Dated: September 3, 2024

LITTLER MENDELSON P.C.

11
12 /s/ Shahram Samie

13 Keith A. Jacoby
14 Shahram Samie

15 Attorneys for Defendant
FEDEX FREIGHT, INC.

16 Dated: September 3, 2024

17 **BLUMENTHAL NORDREHAUGH**
18 **BHOWMIK DE BLOUW LLP**

19
20 /s/ Christine LeVu

21 Christine LeVu
22 Andrew Ronin
23 Charlotte James

24 Attorneys for Plaintiff
25 SEANDEE GAYDEN
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28

1 I, Shahram Samie, am the ECF User whose identification and password are
2 being used to file this Joint Stipulation and Order. In compliance with Local Rule 5-
3 1(i)(3), I hereby attest that all signatories hereto concurred in and authorized this
4 filing.

5 /s/ Shahram Samie
6 Shahram Samie

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